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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TORRANCE CARR,

Plaintiff,

vs.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01069-DJA

**MOTION FOR AN EXTENSION OF TIME TO  
PROVIDE THE COURT WITH A PAPER COPY  
OF THE CERTIFIED ADMINISTRATIVE  
RECORD**

***(FIRST REQUEST)***

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by and  
2 through her undersigned attorneys, hereby moves for an extension of time to provide the Court with a paper  
3 copy of the Certified Administrative Record (CAR) in this case. The Commissioner’s answer and CAR  
4 are due to be filed by November 14, 2022.

5 The Commissioner intends to file her answer and an electronic copy of the CAR (e-CAR) on the  
6 current deadline of November 14, 2022.<sup>1</sup> However, the Social Security Administration’s Office of  
7 Appellate Operations (OAO), the Office of the General Counsel (OGC), and the United States Attorney’s  
8 Office (USAO) are unable to print and provide a paper copy of the CAR by the current deadline. Therefore,  
9 the Commissioner requests a 21-day extension of time from November 14, 2022 to allow for the submission  
10 of a paper courtesy copy of the CAR for the Court.

11 The Commissioner submits that no prejudice will result from granting this extension. Under the  
12 scheduling orders in this district, Plaintiff’s motion for reversal and/or remand will usually be due 30 days  
13 after issuance of a scheduling order. Plaintiff will not be prejudiced by this extension, as Plaintiff’s counsel  
14 will have access to the e-CAR that the Commissioner intends to file on CM/ECF on the current deadline,  
15 such that Plaintiff’s motion can be drafted and filed. In addition, the scheduling orders of this district  
16 generally allow the Commissioner to file a cross-motion to affirm and response to Plaintiff’s motion within  
17 30 days after Plaintiff’s motion is filed. Plaintiff is also generally allowed another 20 days to file an  
18 optional reply. In light of this timeline, the earliest that the Court may require a paper copy of the CAR to  
19 adjudicate this case will be 60 days after the CAR is filed.

20 For these reasons, the Commissioner respectfully requests that the Court grant this motion and  
21 allow the paper CAR to be provided to the Court within 21 days after the answer/e-CAR are filed.

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26 <sup>1</sup> Defendant previously filed a motion to be relieved of providing the Court with a copy of the CAR on a compact disc, as was required pre-COVID. Dkt. 18.

1 Dated: November 10, 2022

Respectfully submitted,

2 JASON M. FRIERSON  
3 United States Attorney

4 /s/ Andrea Banks  
5 ANDREA BANKS  
6 Special Assistant United States Attorney

7  
8 IT IS SO ORDERED:

9   
10 HONORABLE DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

11 DATED: November 10, 2022  
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**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of the foregoing **MOTION FOR AN EXTENSION OF TIME TO PROVIDE THE COURT WITH A PAPER COPY OF THE CERTIFIED ADMINISTRATIVE RECORD** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorney(s) for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 10, 2022

/s/ Andrea Banks  
ANDREA BANKS  
Special Assistant United States Attorney

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